

Michael D. Adams (State Bar No. 185835)  
madams@rutan.com  
Lucas K. Hori (State Bar No. 294373)  
lhori@rutan.com  
Talya Goldfinger (State Bar No. 294926)  
tgoldfinger@rutan.com  
RUTAN & TUCKER, LLP  
18575 Jamboree Road, 9th Floor  
Irvine, CA 92612  
Telephone: 714-641-5100  
Facsimile: 714-546-9035

Attorneys for Defendant RAEL, INC.

**GOOD | GUSTAFSON | AUMAIS LLP**  
CHRISTOPHER T. AUMAIS (SBN  
249901)  
CHRISTOPHER B. GOOD (SBN 232722)  
J. RYAN GUSTAFSON (SBN 220802)  
2330 Westwood Boulevard, Suite 103  
Los Angeles, California 90064  
Telephone: (310) 274-4463  
E-mail: cta@ggallp.com  
E-mail: cbg@ggallp.com  
E-mail: jrg@ggallp.com

**THE KEETON FIRM, LLC**  
Steffan T. Keeton\*  
100 South Commons, Suite 102  
Pittsburgh, PA 15212  
Telephone: (888) 412-5291  
stkeeton@keetonfirm.com  
\*pro hac vice forthcoming

Counsel for Plaintiff and the Putative Class

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SARAH BLANSETTE, individually, and on  
behalf of those similarly situated,

Plaintiff,

v.

RAEL, INC.,

Defendant.

Case No. 4:23-cv-00006-HSG

**STIPULATION OF DISMISSAL  
AND ORDER**

Hon. Haywood S. Gilliam, Jr.

Date Action Filed: January 3, 2023

Trial Date: Not Set

Pursuant to Rule 41 of the Federal Rules of Civil Procedure, this Stipulation of Dismissal is entered into by and between plaintiff Sarah Blansette (“Plaintiff”) and defendant Rael, Inc. (“Defendant”) based on the following facts:

#### RECITALS

1. On January 3, 2023, Plaintiff initiated this action (the “Action”) by filing a Complaint captioned *Sarah Blansette, individually, and on behalf of those similarly situated v. Rael, Inc.*, Case No. 4:23-cv-00006-HSG. (Dkt. 1.) Plaintiff filed a First Amended Complaint on April 10, 2023. (Dkt. 32.) Plaintiff alleged claims on an individual and putative class basis for (1) violation of California’s Unfair Competition Law, Business & Professions Code §§ 17200, *et seq.*, (2) violation of California’s False Advertising Law, Business & Professions Code §§ 17500, *et seq.*, (3) violation of California’s Consumer Legal Remedies Act, Civil Code §§ 1750, *et. seq.*, and (4) unjust enrichment. Defendant denies that there is any factual or legal basis for Plaintiff’s allegations.

2. Following the initiation of the Action, Defendant provided information relevant to the claims in the Action subject to a confidentiality agreement and Rule 408 of the Federal Rules of Evidence. After dialogue concerning these matters, Plaintiff and Defendants (together, the “Parties”) have reached a settlement which resolves all claims alleged by Plaintiff on an individual basis.

3. Pursuant to the settlement, the Parties agree that Plaintiff will dismiss all of her individual claims in the Action with prejudice.

4. The Parties further agree that Plaintiff will dismiss her putative class claims without prejudice. Plaintiff has not filed a motion for class certification, and no class has been certified in this action, such that the notice requirements of Rule 23(e) of the Federal Rules of Civil Procedure are inapplicable.

5. The Parties agree that they are each to bear their own attorneys’ fees and costs with respect to this action.

///

///

**STIPULATION**

Based on the foregoing, the Parties stipulate and request that the Court dismiss the above-captioned action in its entirety, with each Party to bear their own attorneys' fees and costs, as follows:

1. Plaintiff's individual claims asserted in this action shall be dismissed with prejudice.
2. Plaintiff's putative class claims shall be dismissed without prejudice.

**IT IS SO STIPULATED.**

Dated: July 5, 2023

RUTAN & TUCKER, LLP

By: /s/ Lucas K. Hori

Lucas K. Hori  
Attorneys for Defendant  
RAEL, INC.

Dated: July 5, 2023

GOOD GUSTAFSON AUMAIS LLP

By: /s/ J. Ryan Gustafson

J. Ryan Gustafson  
Attorneys for Plaintiff  
SARAH BLANSETTE

**ORDER**

Based on the stipulation of the parties and for good cause shown, the Court **ORDERS** that the above-captioned action is hereby dismissed in its entirety, with each Party to bear their own attorneys' fees and costs. Plaintiff's individual claims are dismissed with prejudice and Plaintiff's putative class claims are dismissed without prejudice.

**IT IS SO ORDERED.**

Dated: 7/6/2023



HON. HAYWOOD S. GILLIAM, JR.

United States District Judge